

Draft - EMS Licensing Rules Revision

Attached is a draft of rule revisions for the EMS Licensing rules. This is an informal, non-legal draft which has been sent to our legal department for final drafting in preparation for filing – hopefully in January. That will then begin the formal process of advertising, formal comment, public hearing and adoption. The formal adoption process is estimated to take around 60 days from the filing date.

These revisions are submitted to meet two needs:

1. Accommodate and integrate with rule revisions to the EMT Certification rules adopted by the Board of Medical Examiners last spring, especially to allow for endorsement levels of care on EMS services.
2. Update and fix problems with the old rules that are appropriate and necessary to change now.

This revision does not fix everything that could be changed, but does meet a need to expediently integrate with BOME rules. After this set of rules is in place, we will continue to review and discuss other changes. As you may already know, an EMS System Task Force was created last spring. This task force is currently working with us to develop an EMS Plan, due for adoption around next June or July. As soon as that is in place, they will continue to advise of system issues and priorities, including additional changes to these rules.

Please review this draft and informal copy of proposed changes. I would be pleased to accept comments and suggestions during this ‘informal comment’ period. It is much easier to incorporate changes now than in the formal adoption process.

When the formal draft rules are ready and are filed for formal adoption, you will then receive a copy of that set along with information about the public hearing and comments period.

Also enclosed are:

- a brief summary of the changes in these rules
- a copy of the BOME EMT Certification rules (as these EMS Service licensing rules frequently reference the Board’s EMT rules)

Summary of primary rule changes...

- ⊕ The BOME rules added endorsements between the EMT-F, EMT-B, EMT-I, and EMT-P levels. Currently service licensing rules accommodate licensing at the BLS, EMT-D, EMT-I and ALS levels, but don't specifically acknowledge the endorsement levels. This revised set acknowledges two levels of care – **BLS and ALS**. BOME rules require medical director oversight for the training and provision of all endorsements and levels above the EMT-Basic level. These service rules require any service providing care above the EMT-Basic level (including the EMT-B endorsements) to have a service medical director and to be licensed to provide advanced life support.
- ⊕ These proposed rules allow for any service to be authorized to provide advanced life support, but only allow those that can provide ALS 24/7 will be issued an ALS license. Services which provide ALS on a limited basis (usually because of limited staff trained to ALS levels) will receive an authorization for ALS under their basic life support license. Services will submit a narrative Service Plan to describe their ALS operations. The Service Plan concept is being introduced in this draft to enable services to better describe their EMS system. Not only will this be clearer (to us and the public), we feel this can lesson some potential liabilities with the current method of providing everyone ALS licenses, no matter how little they provide it.
- ⊕ While there are basic equipment kit requirements for all services, the kits for advanced life support licenses or authorizations will be 'configurable' by the service and service medical director.
- ⊕ The definition for Non-Transporting Unit is defined a little better.
- ⊕ Following the lead taken by the BOME rules, the service medical director assumes more responsibility and authority for the medical operations of an EMS service, therefore less oversight is required by the us in areas of equipment, protocols, medications, etc.
- ⊕ Changes to the requirement for disposable CO² monitors has been edited to allow electronic monitors and diesel ambulances have no requirement for CO² monitors.